

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION

Plaintiff,

v.

REVELATION CAPITAL MANAGEMENT, LTD.,  
and CHRISTOPHER P.C. KUCHANNY,

Defendants.

No. 14 Civ.645 (VEC)

**JOINT MOTION FOR THE COURT TO ISSUE LETTERS ROGATORY FOR TAKING  
OF DEPOSITIONS AND PRODUCTION OF DOCUMENTS IN CANADA**

Pursuant to Fed. R. Civ. P. 28(b)(3), Plaintiff Securities and Exchange Commission and Defendants Revelation Capital Management Ltd. and Christopher P.C. Kuchanny jointly and respectfully move the Court to issue Requests for International Judicial Assistance to the Ontario Superior Court of Justice in the Province of Ontario requesting the assistance of that Court to compel the attendance of the following witnesses at oral depositions in Ontario: J. Stefan Spicer, Scott J. Smith, David Scott (or a Federal Rule of Civil Procedure 30(b)(6) witness from CIBC World Markets Corp.), a Federal Rule of Civil Procedure 30(b)(6) witness from Canadian Depository of Securities Limited, and a Federal Rule of Civil Procedure 30(b)(6) witness from Canadian Stock Transfer Co., Inc. The joint proposed Requests also request that the aforementioned individuals and entities produce documents in response to document requests. The Requests are needed to obtain evidence necessary for the prosecution and trial of this case. The joint proposed Requests are attached as Exhibit A to the joint memorandum in support of the present motion, filed herewith.

Dated: March 20, 2015

SECURITIES AND EXCHANGE  
COMMISSION

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